



Commonwealth of Massachusetts
**DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT**

Charles D. Baker, Governor ♦ Karyn E. Polito, Lt. Governor ♦ Jennifer D. Maddox, Undersecretary

To: Regional Administering Agencies
From: Brendan Goodwin, Director, Division of Rental Assistance
Subject: Fourth Federal Rental Assistance Guidance Regarding HUD Waivers and DHCD Waivers
Date: May 21, 2021

INTRODUCTION

On April 10, 2020, HUD issued [Notice PIH 2020-05](#), in which it waived and established alternative requirements for numerous statutory and regulatory requirements for its programs, including the Housing Choice Voucher (HCV) program. HUD provided that the use of these waivers would be at the discretion of the public housing authority (here, DHCD), while strongly encouraging the use of any and all waivers and alternative requirements as necessary to keep programs operational to the extent practical. Please see [Notice PIH 2020-05](#) for the full text of the initial pertinent HUD waivers (including those inapplicable to or not adopted by DHCD), as well as statutory and regulatory authority citations.

DHCD first issued guidance on April 30, 2020 setting forth the HUD waivers that DHCD had decided to adopt, along with additional DHCD-specific guidance. On July 2, 2020, HUD issued [Notice PIH 2020-13](#), which superseded Notice PIH 2020-05 and restated the waivers and requirements established in the prior notice, issued technical amendments to several of the previously established waivers and alternative requirements, provided additional waivers and alternative requirements, and extended the periods of availability for previously established waivers and alternative requirements. Based on the second waiver notice that HUD issued in [Notice PIH 2020-13](#), DHCD issued on July 27, 2020 guidance superseding its April 30, 2020 guidance. On November 30, 2020, HUD issued its third waiver notice in [Notice PIH 2020-33](#), which supersedes Notice PIH 2020-13 and primarily amended the prior guidance and further extended the periods of availability for certain previously established waivers and alternative requirements. On May 4, 2021, HUD issued its fourth waiver notice in [Notice PIH 2021-14](#), which supersedes the prior notices. This notice further extends the periods of availability for certain previously established waivers and alternative requirements and adds three new applicable waivers. The guidance herein sets forth those amendments and extensions.

As with DHCD's prior guidance and accompanying summary table, DHCD reserves the right to amend, add to, or remove these waivers as necessary, and DHCD will notify the RAAs and the public of any changes made. Again, to the extent that provisions of the DHCD Section 8 Administrative Plan noted herein and previous DHCD guidance conflict with this guidance, this guidance will supersede the Administrative Plan and other guidance for as long as each waiver is in effect.

Please note that, wherever a waiver is applied, the tenant file must be clearly documented with a note to file or other documentation illustrating the action(s) taken.

SUMMARY OF CHANGES

As applicable to DHCD's program, Notice PIH 2021-14 adds waivers PH and HCV-8 and PH and HCV-9, detailed further below. It also extends most availability periods with a general revised deadline of December 31, 2021 for applicable waivers. A summary of the extensions is listed here, with applicable details in each section below.

- PH and HCV-2: Family Income and Composition: Delayed Annual Examinations
- PH and HCV-3: Family Income and Composition: Annual Examination; Income Verification Requirements
- PH and HCV-4: Family Income and Composition: Interim Examinations
- PH and HCV-5: Enterprise Income Verification (EIV) Monitoring
- PH and HCV-6: Family Self-Sufficiency (FSS) Contract of Participation: Contract Extension
- PH and HCV-8: Eligibility Determination: Income Verification
- PH and HCV-9: Eligibility Determination: Social Security Number and Citizenship Verification
- HQS-1: Initial Inspection Requirements
- HQS-2: Project-Based Voucher (PBV) Pre-HAP Contract Inspections: PHA Acceptance of Completed Units
- HQS-5: HQS Inspection Requirement: Biennial Inspections
- HQS-6: HQS Interim Inspections
- HQS-7: PBV Turnover Unit Inspections
- HQS-8: PBV HAP Contract: HQS Inspections to Add or Substitute Units
- HQS-9: HQS Quality Control Inspections
- HCV-2: Information When Family is Selected: PHA Oral Briefing
- HCV-3: Term of Voucher: Extensions of Term
- HCV-4: PHA Approval of Assisted Tenancy: When HAP Contract is Executed
- HCV-5: Absence from Unit
- HCV-6: Automatic Termination of HAP Contract
- HCV-7: Increase in Payment Standard During HAP Contract Term
- HCV-8: Utility Allowance Schedule: Required Review and Revision
- HCV-10: Family Unification Program (FUP): FUP Youth Age Eligibility to Enter HAP Contract
- HCV-11: Family Unification Program (FUP): Length of Assistance for Youth
- HCV-12: Family Unification Program (FUP): Timeframe for Referral
- HCV-14: Mandatory Removal of Unit from PBV HAP Contract

(The prior guidance also added waivers/alternative requirements to the Mainstream (5 and 2018) program, set forth in [Notice PIH 2020-22](#), as MS-1 (Initial Lease Term), MS-2 (Criminal Background Screening), and MS-3 (Mainstream Age Eligibility to Enter HAP Contract). See HUD Mainstream Voucher Waivers below and in Appendix for further details.)

This guidance further adds waivers/alternative requirements to the Mod Rehab program, set forth in [Notice PIH 2020-20](#), as MR-1 (Family Income and Composition: Delayed Annual Examinations), MR-0 (Family Income and Composition: Annual Examination; Income Verification Requirements), MR-3 (Family Income and Composition: Interim Examinations), MR-4 (Enterprise Income Verification

Monitoring), MR-5 (PHA Inspection Requirement: Annual Inspections), and MR-6 (Adjustment of Utility Allowance). See the Mod Rehab Waivers below and in the Appendix for further details).

HUD RENTAL ASSISTANCE WAIVERS

PH and HCV-2: Family Income and Composition: Delayed Annual Examinations

DHCD requests that RAAs make all reasonable efforts to fully complete reexaminations in a timely manner. If it is not feasible or safe to complete a regular (triennial, biennial, or annual) reexam in a timely manner, DHCD will allow the RAA to delay the reexam. Any delayed reexams must follow HCV-7 below. All regular reexaminations due in Calendar Year 2020 should have been completed by December 31, 2020. Reexaminations due in Calendar Year 2021 must be completed by December 31, 2021.

The waiver requires that if the regular reexam is delayed, RAAs must still apply the increased Payment Standard that would have been in effect beginning on the date the regular reexam would have been effective absent the waiver. In addition, pursuant to a technical amendment to DHCD's MTW Plan, the RAA must also apply increased Payment Standards between regular reexaminations at the time of an approved contract rent increase.

- For example, if the reexam ordinarily would have been required in June 2020 and the family had a gross rent that exceeded the FY2020 payment standard, the RAA would have to apply the increased payment standard in June.

DHCD is further requesting that RAAs internally track all regular reexams that fall within this "increase/change of APS" so as to ensure compliance with this nuanced waiver. RAAs should also keep an internal log as to each month post-March 2020 with the regular reexams that were delayed and outstanding for that month, as well as their ultimate completion date (prior to the applicable waiver deadline as noted above) and effective date.

PH and HCV-3: Family Income and Composition: Annual Examination – Income Verification Requirements

DHCD requests that RAAs make all reasonable efforts to continue to use the income verification hierarchy. When it is not feasible, DHCD will allow RAAs to forgo third-party verification and may accept self-certification as the highest form of verification. DHCD will accept the use of a bank statement (i.e. credit/deposit to account) as verification of DTA or unemployment benefits. An electronic copy, including a screenshot or photo of the statement, will be acceptable during this time. DHCD notes that EIV is still fully operational and accessible remotely and should continue to be used routinely to the extent possible for Social Security benefits, SSI benefits, and Medicare Part B premiums. RAAs will be responsible for addressing any material discrepancies that may arise from this waiver later.

DHCD previously sent out [guidance](#) temporarily waiving rules requiring notarization and/or in-person verification of self-certification documentation (see [Administrative Plan](#) § 6.1), again with the understanding that if there is a question of the veracity of the self-certification, follow-up inquiries shall be conducted at a later time.

The period of availability to conduct regular reexaminations using these modified verification requirements ends on December 31, 2021.

PH and HCV-4: Family Income and Composition: Interim Examinations

DHCD requests that RAAs make all reasonable efforts to continue to use the income verification hierarchy. When it is not feasible, DHCD will allow RAAs to forgo third-party verification and may accept self-certification as the highest form of verification. As DHCD earlier noted, DHCD will accept the use of a bank statement as verification of DTA or unemployment benefits and EIV is still running and accessible remotely and should continue to be used routinely to the extent possible for Social Security benefits, SSI benefits, and Medicare Part B premiums. RAAs will be responsible for addressing any material discrepancies that may arise from this waiver later.

Identical to regular reexams above with these interim reexams, DHCD previously sent [guidance](#) temporarily waiving rules requiring notarization and/or in-person verification of self-certification documentation (see [Administrative Plan](#) § 6.1) (again with the understanding that if there is a question of the veracity of the self-certification, follow-up inquiries shall be conducted at a later time).

The period of availability to conduct annual reexaminations using these modified verification requirements ends on December 31, 2021.

PH and HCV-5: Enterprise Income Verification (EIV) Monitoring

While HUD has waived mandatory EIV monitoring requirements of its reports through December 31, 2021, DHCD urges the RAAs to continue EIV monitoring, including IVT, as much as possible and notes the potential administrative burden if there is a backlog of EIV deficiencies that eventually need to be corrected. In particular, the RAAs will need to continue to monitor and remedy the DHCD-distributed Deceased Tenant Reports and make best efforts to reduce the records within the Invalid SSA Identity Reports as well as the Multiple Subsidy Reports. When the RAA cannot address these reports, the RAA should notify Larry Gomes via email as soon as feasible to create a strategy of resolving the outstanding issues with timelines. As these remain priority matters that can swell out of control if not addressed, DHCD will continue to monitor and RAAs should continue resolving these issues accordingly. This will require the RAA to continue to submit to PIC ('58-MTW and conventional 50058) to the fullest extent that this COVID-19 emergency allows.

PH and HCV-6: Family Self-Sufficiency (FSS) Contract of Participation; Contract Extension

DHCD requests RAAs to utilize this waiver to allow participants with COVID-19 circumstances that would not warrant an extension under existing FSS Extensions guidance to request an extension to their Contract of Participation. The period of availability during which the RAA may extend the family's contract of participation using COVID-19 as good cause ends on December 31, 2021.

DHCD has updated the FSS Data Collection Tool to include this extension option, and all COVID-19 extensions should be reported in this way in the tool.

HUD also provided clarifying language for FSS participants regarding employment/furlough status:

- A participant who is *furloughed* (still employed, on a non-pay status, but will return to work once the situation is over), is still considered employed for FSS purposes. A person who has been *laid off* (even if they expect/hope to return to the job) is considered unemployed for FSS purposes.

PH and HCV-8: Eligibility Determination: Income Verification

As with PH and HCV-3 (verification for regular reexams) and PH and HCV-4 (verification for interim reexams), DHCD requests that RAAs make all reasonable efforts to continue to use the income verification hierarchy. When it is not feasible, DHCD will allow RAAs to forgo third-party verification and may accept self-certification as the highest form of verification. DHCD will accept the use of a bank statement (i.e. credit/deposit to account) as verification of DTA or unemployment benefits. An electronic copy, including a screenshot or photo of the statement, will be acceptable during this time.

Applicants must submit an affidavit attesting to reported income, assets, expenses, and other factors that would affect an income eligibility determination. Additionally, applicants may provide third-party documentation that represents the applicant's income within the 60-day period prior to admission or voucher issuance but is not dated within 60 days of the PHA's request.

DHCD notes that EIV is still fully operational and accessible remotely and should continue to be used routinely to the extent possible for Social Security benefits, SSI benefits, and Medicare Part B premiums. RAAs must still review EIV income and IVT reports within 120 days of the PIC submission and maintain those records in the file, and RAAs will be responsible for addressing any material discrepancies uncovered at that time or that may arise from this waiver later.

The adoption of this waiver does not authorize any ineligible family to receive assistance under these programs. If an RAA later determines that an ineligible family received assistance, the RAA must take steps to terminate that family from the program.

DHCD previously sent out [guidance](#) temporarily waiving rules requiring notarization and/or in-person verification of self-certification documentation (see [Administrative Plan](#) § 6.1), again with the understanding that if there is a question of the veracity of the self-certification, follow-up inquiries shall be conducted at a later time.

The period of availability to conduct annual reexaminations using these modified verification requirements ends on December 31, 2021.

PH and HCV-9: Eligibility Determination: Social Security Number and Citizenship Verification

Because HUD understands that, due to COVID-19, documentation may be difficult to obtain, HUD is waiving the requirement to obtain and verify SSN documentation and documentation evidencing eligible noncitizen status before admitting applicants to the HCV program. Individuals who are unable to provide required documentation prior to admission must provide that documentation within 90 days of admission to be eligible for continued assistance, pending verification. Additionally, RAAs may accept self-certification of date of birth and disability status if a higher level of verification is not immediately available. If self-certification is used, the RAA must obtain a higher level of verification within 90 days of admission or verify the information in EIV.

The adoption of this waiver does not authorize any ineligible family to receive assistance under these programs. If an RAA determines that an ineligible family received assistance, the RAA must take steps to terminate that family from the program.

The period of availability for this waiver ends on December 31, 2021.

HUD HOUSING QUALITY STANDARDS (HQS) INSPECTIONS WAIVERS

HQS-1: Initial Inspection Requirements and Local Board of Health Inspection Documentation

DHCD is encouraging the RAAs to conduct physical inspections on vacant units when possible and safe. If in-person inspections are not feasible or safe to complete, DHCD will allow RAAs to accept owner certifications on initial inspections. To enter into a HAP contract and begin making payments, the RAA at minimum must require that an owner certify that they have no knowledge that the unit has any life-threatening conditions.

The RAA must document the self-certification in the file, and an owner self-certification must include the following:

- Owner certification that they have no knowledge that the unit has any life-threatening conditions;
- Owner acknowledgment that heating system is in good working order; and
- If the owner does not include water in the lease, the owner would need to attest that the water/sewer meter is separate.

This certification may be sent electronically.

DHCD and the RAAs retain the right to conduct an inspection at any time deemed necessary.

Outside of the HUD waiver, DHCD is also waiving its requirement that new leases contain documentation for certificates of fitness/occupancy from local Boards of Health (though DHCD does not have the authority to waive the state sanitary code itself).

The period of availability for RAAs to accept owner's self-certification for an initial inspection ends on December 31, 2021. For any unit for which an RAA accepted an owner's self-certification, the RAA must conduct an HQS inspection as soon as reasonably possible but no later than June 30, 2022. The waiver of DHCD's Board of Health documentation ends on December 31, 2021 unless extended by subsequent notice.

HQS-2: Project-Based Voucher (PBV) Pre-HAP Contract Inspections, PHA Acceptance of Completed Units

DHCD is encouraging the RAAs to conduct physical inspections on vacant units when possible and safe. If in-person inspections are not feasible or safe to complete, DHCD will allow RAAs to accept owner certifications on initial inspections.

The RAA must document the self-certification in the file, and an owner self-certification must include the following:

- Owner certification that they have no knowledge that the unit has any life-threatening conditions;
- Owner acknowledgment that heating system is in good working order; and
- If the owner does not include water in the lease, the owner would need attest that the water/sewer meter is separate.

This certification may be sent electronically.

DHCD and the RAAs retain the right to conduct an inspection at any time deemed necessary.

The period of availability for RAAs to accept an owner’s self-certification for the pre-HAP inspection/completion of work requirement ends on December 31, 2021. For any unit for which a PHA accepted an owner’s self-certification, the RAA must conduct an HQS inspection as soon as reasonably possible but no later than June 30, 2022.

HQS-5: HQS Inspection Requirement – Biennial Inspections

DHCD is not requiring RAAs to conduct inspections of occupied units if it is deemed unsafe during the COVID-19 emergency. If in-person inspections are not feasible or safe to complete, DHCD will allow RAAs to accept owner certifications on biennial/regular inspections.

The RAA must document the self-certification in the file, and an owner self-certification must include the following:

- Owner certification that they have no reasonable basis to have knowledge that the unit has any life-threatening conditions;
- Owner acknowledgment that heating system is in good working order; and
- If the owner does not include water in the lease, the owner would need attest that the water/sewer meter is separate.

DHCD/the RAA retains the right to conduct an inspection at any time deemed necessary. RAAs must resume biennial inspections by December 31, 2021. The RAA must conduct all biennial inspections from Calendar Year 2020 as soon as reasonably possible but no later than June 30, 2022 and must conduct all delayed biennial inspections from Calendar Year 2021 as soon as reasonably possible but no later than December 31, 2022.

HQS-6: HQS Interim Inspections

If the RAA is notified of a life-threatening condition, it must notify the owner who must provide evidence (text/email of photos, repair invoices, tenant certification, etc.) that is satisfactory to the RAA within 24 hours that it is fixed or that it doesn’t exist. After receiving the owner’s evidence, DHCD encourages the RAA to reach out to the participant to ensure that the violation has been corrected, if they don’t already have a tenant certification of the repairs.

If a non-life-threatening condition, the RAA must notify the owner within 30 days and the owner must provide verification of correction (text/email of photos, repair invoices, tenant certification, etc.) that is satisfactory to the RAA within 30 days of notification. The RAA is not required to physically re-inspect the unit.

In the event of a disagreement, the tenant may also send photos of the unit to the RAA.

In either case, the RAA must document the file with the verification.

The period of availability ends on December 31, 2021. After December 31, 2021, the RAA must conduct the HQS inspection in accordance with the applicable time periods upon notification by a family or government official that the assisted unit does not comply with the HQS.

HQS-7: PBV Turnover Unit Inspections

DHCD is encouraging the RAAs to conduct physical inspections on vacant units when possible and safe. If in-person inspections are not feasible or safe to complete, DHCD will allow RAAs to accept owner certifications on initial inspections.

The RAA must document the self-certification in the file, and an owner self-certification must include the following:

- Owner certification that they have no knowledge that the unit has any life-threatening conditions;
- Owner acknowledgment that heating system is in good working order; and
- If the owner does not include water in the lease, the owner would need attest that the water/sewer meter is separate.

This certification may be sent electronically.

DHCD and the RAAs retain the right to conduct an inspection at any time deemed necessary.

The period of availability for RAAs to accept owner's self-certification for an initial inspection of a turnover unit ends on December 31, 2021. For any unit for which an RAA accepted an owner's self-certification, the RAA must conduct an HQS inspection as soon as reasonably possible but no later than June 30, 2022.

HQS-8: PBV HAP Contract – HQS Inspections to Add or Substitute Units

HUD PBV requirements provide that, before adding to or substituting a new unit in a HAP contract, the unit meet housing quality standards. This waiver allows for PBV units to be added or substituted in the HAP contract based on owner certification that there are no life-threatening deficiencies, and allows for a delayed full HQS inspection.

While DHCD is adopting this waiver, we will apply it on a case-by-case basis. If this situation arises during the availability period, the RAA will need to request a waiver from DHCD prior to implementation by contacting Dan Tobbyne (PBV Specialist) via email.

The period of availability for RAAs to accept owner's self-certification for an initial inspection ends on December 31, 2021. The RAAs will need to inspect any unit that was placed under HAP contract based on the owner's self-certification as soon as reasonably possible but no later than June 30, 2022.

HQS-9: HQS Quality Control Inspections

HUD is waiving the requirement for PHAs to conduct supervisory quality control inspections of a sampling of units under contract, and as such, DHCD is suspending this requirement and will require the RAAs to resume QC inspections after December 31, 2021.

HQS-10: Housing Quality Standards: Space and Security

HUD ordinarily requires that each assisted dwelling unit have at least one bedroom or living/sleeping room for each two persons. But, for the duration of the current lease term or one year from the date of this notice, whichever period of time is longer, HUD is waiving this requirement where a PHA wishes to assist a current participant that needs to add a member or members to the assisted household as a result of the COVID-19 emergency, and absent a waiver the additional family members would result in the unit not meeting the space and security standards. This waiver does not apply to an initial or new lease.

DHCD will allow this waiver but notes that this does not apply to (and DHCD does not have the authority to waive) the state sanitary code.

For any family occupying a unit that does not meet the space and security requirements pursuant to this waiver, the waiver will be in effect for the duration of the current lease term or one year from the date of this notice, whichever period is longer.

HUD HCV WAIVERS

HCV-2: Information When Family is Selected – PHA Oral Briefing

Through December 31, 2021, DHCD will allow RAAs to conduct alternative briefings, other than in-person briefings. These briefings may take the form of webinars, recorded video briefings, video or teleconference or other alternative means, so long as they effectively communicate with, and allow for equal participation of, each family member, including those with vision, hearing, and other communication-related disabilities, and ensures meaningful access for persons with limited English proficiency. RAAs will need to document the file with a note citing that this waiver has been applied in each case.

HCV-3: Term of Voucher – Extensions of Term

DHCD previously released [guidance](#) related to voucher term extensions.

While DHCD policy currently provides for a 60-day voucher search term, with an automatic 30-day extension upon request, and other extensions upon request in extenuating circumstances, during the state

of emergency, DHCD will waive the extension requirements set forth in DHCD's Administrative Plan § 5.5.2. The 60-day voucher search term shall be extended automatically until 30 calendar days past the expiration of the state of emergency. During that period, applicants will not be required to submit a request for extension.

HCV-4: PHA Approval of Assisted Tenancy – When HAP Contract is Executed

HUD's regulations require a HAP contract to be executed no later than 60 days from the beginning of the lease term. Any HAP contract executed after the 60-day period is void and the PHA may not pay any housing assistance payments to the owner. HUD is waiving this requirement to allow PHAs to execute the HAP contract after the 60-day deadline has passed and make housing assistance payments back to the beginning of the lease term.

DHCD requests that RAAs make best efforts to fully execute the HAP contract within 60 days of the beginning of the lease term. If this is not feasible, the RAA and owner may execute the HAP contract after the 60-day deadline has passed but must execute the HAP contract no later than 120 days from the beginning of the lease term. If utilizing this waiver, the RAA should so note on the HAP contract itself.

The period of availability to execute the HAP contract after the normal 60-day period from the beginning of the lease term ends on December 31, 2021.

DHCD is further requesting that RAAs internally track all HAP contracts that fall within this "beyond 60 days execution" so as to ensure compliance with this nuanced waiver and keep an internal log.

HCV-5: Absence from Unit and Guest Policy

Through December 31, 2021, DHCD will allow the RAAs to use discretion to allow extended absences from units due to extenuating circumstances (e.g., hospitalization, extended stays at nursing homes, caring for family members).

The requests for allowance of extended absences from the assisted unit and relaxation of guest policies are further addressed by the DHCD guidance suspending termination proceedings, as these family obligations would normally be enforced by the RAAs through initiation of a termination proceeding. Accordingly, until further notice, these family obligations will not be enforced and terminations will not be initiated on these grounds. RAAs shall begin enforcing these family obligations again after the state of emergency, but must specifically consider on a case-by-case basis all mitigating circumstances related to COVID-19 (e.g. if a participant remains hospitalized for COVID-related reasons even after the state of emergency ends) when initiating an enforcement action. Further, while DHCD cannot prevent a property owner from moving to evict on a violation of these grounds if they are contained in the lease between property owner and tenant, during the state of emergency, DHCD will not proceed with voucher terminations due to evictions on these grounds. RAAs must maintain documentation in the tenant file explaining the extenuating circumstances that caused the extended absence.

HCV-6: Automatic Termination of HAP Contract

HUD regulations provide that when an HCV family's income increases to the extent that the housing assistance payment is reduced to \$0, PHAs are required to automatically terminate HAP contracts 180 days after the last housing assistance payment to the owner.

For affected HAP contracts, the RAA may extend, until no later than December 31, 2021, the period of time following the last payment to the owner that would normally trigger the automatic termination of the HAP contract.

DHCD is further requesting that RAAs keep a log to internally track all HAP contracts that fall within this “Zero HAP” extension to ensure compliance with this nuanced waiver and to ensure that any extensions do not go beyond December 31, 2021. DHCD will require the RAA to review all participants that fall into this category and provide DHCD with another interim status update by June 30, 2021, and a subsequent status update by December 31, 2021.

HCV-7: Increase in Payment Standard Under HAP Contract Term

DHCD received approval of a technical amendment to its MTW Plan allowing for the application of increased payment standards at interim contract rent increase for all households on a biennial or triennial reexamination frequency. Where the payment standard in effect at the time of the applicable interim recertification reflects a decrease when compared to the payment standard applied at the last regular recertification, DHCD will not update the payment standard at the interim recertification and will wait until the next regular recertification to update the payment standard.

This policy change is permanent and not subject to the applicability period of HUD PIH Notice 2021-14.

HCV-8: Utility Allowance Schedule – Required Review and Revision

HUD is waiving its regulatory requirement to allow for a delay in PHAs’ annual review of utility allowances. However, RAAs will need to have reviewed and updated non-MTW utility allowances prior to December 1, 2020, and it is expected that RAAs will have updated their non-MTW utility allowances in Tenmast for an effective date of December 1, 2020. Reviews and updates for 2021 shall be completed and entered into Tenmast for an effective date of December 1, 2021.

HCV-10: Family Unification Program (FUP): FUP Youth Age Eligibility to Enter HAP Contract

DHCD will accept referrals from DCF within current allocation limits and allow RAAs to execute HAP contracts with DCF-referred youth up until their 26th birthday (instead of 25). The RAA will be required to track this information and note the file adequately. DHCD will notify DCF of this implementation.

The period of availability for RAAs to execute HAP contracts with DCF-referred youth up until their 26th birthday ends December 31, 2021.

HCV-11: Family Unification Program (FUP): Length of Assistance for Youth

The applicable statute limits the availability of assistance to a period “not to exceed 36 months.” To prevent homelessness (in cases of job loss or not being able to find a unit due to COVID), HUD is waiving the statutory limitation, and thus for FUP youth who will reach the 36-month limit between April 10, 2020 and June 30, 2021, a PHA may suspend terminations of assistance for a period of up to six months from the date the youth’s assistance would have been terminated absent this waiver.

Depending on the timing and length of the suspension, impacted youth may have their assistance extended beyond December 31, 2021. The period of availability to grant the extension ends on December 31, 2021.

HCV-12: Family Unification Program (FUP): Timeframe for Referral

The applicable statute provides that assistance may be provided on behalf of “otherwise eligible youths who have attained at least 18 years of age and not more than 24 years of age and who have left foster care or will leave foster care within 90 days.” Due to the COVID-19 pandemic, it may be difficult for youth to find available units within the 90-day timeframe, so to prevent risk of homelessness, HUD is waiving the statutory limitation and accordingly, through December 31, 2021, DHCD and the RAAs may accept referrals from DCF for youth who will leave foster care within 120 days.

HCV-14: Mandatory Removal of Unit from PBV HAP Contract

Under the PBV program, a PHA is required to remove a unit from a PBV HAP contract after 180 days of zero housing assistance payments to the unit owner on behalf of the family residing in the unit. This situation arises when the family increases its income to such an extent that it no longer requires housing assistance.

Due to COVID-19 uncertainty, HUD is waiving this requirement and is authorizing a PHA, at its discretion, to keep such units under contract for a period of time that exceeds 180 days but does not extend beyond June 30, 2021.

Similarly, with respect to 24 C.F.R §983.258, HUD is providing that a PHA may resume housing assistance payments on behalf of a family residing in such a unit should the family’s income change at any point during the period of time covered by the extension.

HUD MAINSTREAM VOUCHER WAIVERS (ESTABLISHED IN NOTICE PIH 2020-22)

MS-1: Initial Lease Term

HUD is waiving its statutory and regulatory requirement that voucher participants must enter into an initial lease term with the owner for one year, unless the PHA determines that a shorter term would improve housing opportunities for the tenant and the shorter term is a prevailing market practice. To provide a greater range of housing opportunities for Mainstream voucher holders, RAAs may enter into initial lease terms of less than one year regardless of whether the shorter lease term is a prevailing market practice. The period of availability for this waiver ends on December 31, 2021.

MS-2: Criminal Background Screening

HUD encourages PHAs to use their Mainstream vouchers to prevent, prepare for, and respond to coronavirus which, for some communities, will mean finding long-term housing solutions for those transitioning out of institutional settings or currently in rapid rehousing or other emergency temporary housing. To help PHAs assist populations in need of transitioning into long-term housing, PHAs may establish, as an alternative requirement, screening requirements for applicants for Mainstream vouchers which are distinct from those in place for its HCV program in general.

Without waiving compliance with the mandatory screening and denial requirements in sex offender and other criminal background screening, in order to facilitate reentry and successful transition to long-term housing, DHCD reminds RAAs to use the discretion permitted in the Admin Plan in considering mitigating circumstances when screening Mainstream applicants.

MS-3: Mainstream Age Eligibility to Enter HAP Contract

Statutory authority provides that the eligible member of a Mainstream household must be non-elderly, defined as at least 18 years of age and under 62 years of age (not yet reached their 62nd birthday) to be eligible to be placed under HAP contract. Where PHA operations may have been shut down or severely curtailed, where unit searches are not possible due to shelter-in-place orders, or where the movement of people is significantly restricted, a Mainstream-eligible individual issued a voucher at 61 years of age may not be able to lease the voucher before their 62nd birthday.

As an alternative requirement, and in order to extend the time in which a Mainstream-eligible family has to enter into HAP contract, DHCD has chosen to adopt the expansion of the definition of an eligible non-elderly family member to include those who were issued a voucher prior to turning 62 and were not yet 63 on the effective date of the HAP contract. The period of eligibility for this alternative requirement ends on December 31, 2021.

HUD MOD REHAB VOUCHER WAIVERS (ESTABLISHED IN NOTICE PIH 2020-20)

MR-1: Family Income and Composition: Delayed Annual Examinations

HUD is waiving this statutory and regulatory requirement to permit PHAs to delay annual reexaminations of Mod Rehab families. All annual reexaminations due in CY2020 must be completed by June 30, 2021. Reexams due in CY2021 must be completed by December 31, 2021.

MR-0: Family Income and Composition: Annual Examination; Income Verification Requirements

DHCD requests that RAAs make all reasonable efforts to continue to use the income verification hierarchy. When it is not feasible, DHCD will allow RAAs to forgo third-party verification and may accept self-certification as the highest form of verification. DHCD will accept the use of a bank statement (i.e. credit/deposit to account) as verification of DTA or unemployment benefits. An electronic copy, including a screenshot or photo of the statement, will be acceptable during this time. DHCD notes that EIV is still fully operational and accessible remotely and should continue to be used routinely to the extent possible for Social Security benefits, SSI benefits, and Medicare Part B premiums. RAAs will be responsible for addressing any material discrepancies that may arise from this waiver later.

DHCD previously sent out [guidance](#) temporarily waiving rules requiring notarization and/or in-person verification of self-certification documentation (see [Administrative Plan](#) § 6.1), again with the understanding that if there is a question of the veracity of the self-certification, follow-up inquiries shall be conducted at a later time.

The period of availability to conduct annual reexaminations using these modified verification requirements ends on December 31, 2021.

MR-3: Family Income and Composition: Interim Examinations

DHCD requests that RAAs make all reasonable efforts to continue to use the income verification hierarchy. When it is not feasible, DHCD will allow RAAs to forgo third-party verification and may accept self-certification as the highest form of verification. As DHCD earlier noted, DHCD will accept the use of a bank statement as verification of DTA or unemployment benefits and EIV is still running and accessible remotely and should continue to be used routinely to the extent possible for Social Security benefits, SSI benefits, and Medicare Part B premiums. RAAs will be responsible for addressing any material discrepancies that may arise from this waiver later.

As noted above, DHCD previously sent [guidance](#) temporarily waiving rules requiring notarization and/or in-person verification of self-certification documentation (see [Administrative Plan](#) § 6.1) (again with the understanding that if there is a question of the veracity of the self-certification, follow-up inquiries shall be conducted at a later time).

The period of availability to conduct annual reexaminations using these modified verification requirements ends on December 31, 2021.

MR-4: Enterprise Income Verification Monitoring

While HUD has waived mandatory EIV monitoring requirements of its reports through December 31, 2021, DHCD urges the RAAs to continue EIV monitoring, including IVT, as much as possible and notes the potential administrative burden if there is a backlog of EIV deficiencies that eventually need to be corrected. In particular, the RAAs will need to continue to monitor and remedy the DHCD-distributed Deceased Tenant Reports and make best efforts to reduce the records within the Invalid SSA Identity Reports as well as the Multiple Subsidy Reports. When the RAA cannot address these reports, the RAA should notify Larry Gomes via email as soon as feasible to create a strategy of resolving the outstanding issues with timelines. As these remain priority matters that can swell out of control if not addressed, DHCD will continue to monitor and RAAs should continue resolving these issues accordingly. This will require the RAA to continue to submit to PIC ('58-MTW and conventional 50058) to the fullest extent that this COVID-19 emergency allows.

MR-5: PHA Inspection Requirement: Annual Inspections

In order to provide PHAs with the necessary flexibilities to postpone the normally required inspections, HUD is waiving the annual inspection requirement and is allowing PHAs to delay annual inspections for Mod Rehab units. All delayed annual inspections must be completed as soon as reasonably possible but no later than one year after the date the annual inspection would have been required absent the waiver.

DHCD and its designees retain the right to conduct an inspection on any Mod Rehab unit at any time, though must grant the reasonable accommodation requests of tenants with disabilities related to inspections. Use of this waiver by the PHA does not relieve owners of their responsibility to maintain the unit in accordance with HQS as required in the HAP contract, nor does it in any way restrict the PHA from taking action to enforce the owner's obligations.

RAAs must conduct the delayed annual inspection as soon as reasonably possible but no later than one year after the date the annual inspection would have been required absent the waiver.

MR-6: Adjustment of Utility Allowance

HUD is waiving its regulatory requirement to allow for a delay in PHAs' annual review of utility allowances. However, RAAs will need to have reviewed and updated non-MTW utility allowances prior to December 1, 2020, and it is expected that RAAs will have updated their non-MTW utility allowances in Tenmast for an effective date of December 1, 2020. Reviews and updates for 2021 shall be completed and entered into Tenmast for an effective date of December 1, 2021.

OTHER HUD WAIVERS AND ADMINISTRATIVE RELIEF

11c. Uniform Financial Reporting Standards

DHCD will adopt the HUD waiver allowing it to submit its audited financial statement by September 30, 2021.

12a. HUD Form 50058

HUD requires that PHAs submit form HUD-50058 no later than 60 calendar days from the effective date of any action recorded on line 2b of the form HUD-50058 or form HUD-50058 MTW. HUD waived that deadline through December 31, 2020 and provided that PHAs must submit form HUD-50058 or HUD-50058 MTW for transactions impacted by implemented waivers and alternative requirements within 90 days of the effective date of action.

As this extension is now expired, DHCD is requesting all RAAs to make all efforts to continue to submit to PIC by HUD Secure Systems the required HUD 50058 forms ('58-MTW and conventional 50058) within the original 60-day deadline whenever possible.

OTHER DHCD WAIVERS AND GUIDANCE

CARES Act Unemployment Payments

The CARES Act provided for a supplemental unemployment payment of \$600 per week until July 31, 2020 for eligible recipients. HUD advised (see HUD [FAQS](#)) that this expanded unemployment payment must be excluded from annual income. Federal Pandemic Unemployment Compensation (FPUC) will continue until the week ending on September 4, 2021, and that additional \$300 payment shall be excluded from income calculations.

Extended unemployment compensation received through Pandemic Emergency Unemployment Compensation (PEUC) shall be included in the income calculation, as PEUC is simply an extension of regular unemployment benefits. The PEUC program will conclude the week ending September 4, 2021.

American Rescue Plan Child Tax Credit

The American Rescue Plan temporarily (for tax year 2021) increased the tax credit families with children could receive per qualifying child. In addition, these amounts may be advanced in regular installments rather than in a typical lump-sum refund once a year at tax time. RAAs shall exclude this child tax credit from the annual income calculation.

Reporting Increases in Income and Conducting Retroactive Rent Reexaminations for Tenants Who Were Not Able to Report a Decrease in Income

DHCD does not intend to implement temporary guidance generally allowing suspension of the required time for tenants to report increases in income or retroactive rent reexaminations for tenants who were not able to report their decrease in income. However, if a family can demonstrate the existence of extenuating circumstances solely due to limitations caused by the COVID-19 crisis, RAAs, using sound and reasoned judgment, may consider such allowances on a case-by-case basis.

Implementation of Triennial Reexams

DHCD is accelerating its implementation of triennial reexams for elderly/disabled households with fixed incomes (MTW Activity 2011-4, Multi-year Recertifications). In addition, DHCD received approval to implement a technical amendment to its MTW Plan in order to allow RAAs to immediately shift eligible households to a triennial cycle at the time of their biennial recertification. Effectively, the recertification will be pushed out one year without the need to first complete the biennial recertification. Triennial households, of course, are eligible to request an interim recertification should their income decrease for any reason.

Correction of QC Document Errors

While it is expected that financial errors uncovered in QC reviews be corrected as quickly as possible and within the timeline prescribed in the QC protocol, DHCD will waive deadlines of other non-substantive errors. It is expected that these errors will still be corrected upon return to normal business operations, but DHCD will not factor them into calculation of benchmark scores (given that the QC Monitor will not be re-programmed and these errors will still appear in the system as overdue).

Appendix: Mass DHCD (MA901) Summary Chart of Waivers Adopted and Waivers Not Adopted through PIH Notice 2020-05

Number in Notice	Waivers	Summary of alternative requirements	Availability Period	Implemented?	Date adopted	Comments
PH and HCV-1 PHA 5-Year and Annual Plan	<p><u>Statutory Authority</u> Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h)</p> <p><u>Regulatory Authority</u> 24 CFR §§ 903.5(a)(3), 903.5(b)(3), 903.13(c), 903.21, 903.23</p>	<ul style="list-style-type: none"> Alternative dates for submission Changes to significant amendment process 	<ul style="list-style-type: none"> Varies based on FYE 12/31/20 	No		N/A
PH and HCV-2 Family income and composition – delayed annual reexaminations	<p><u>Statutory Authority</u> Section 3(a)(1)</p> <p><u>Regulatory Authority</u> 24 CFR §§ 982.516(a)(1), 960.257(a)</p>	<ul style="list-style-type: none"> Permits the PHA to delay the annual reexamination of income and family composition HCV PHAs must implement HCV-7 for impacted families if they implement this waiver 	<ul style="list-style-type: none"> 12/31/21 	Yes		DHCD requests that RAAs make all reasonable efforts to fully complete reexaminations in a timely manner. If it is not feasible or safe to complete an annual reexam in a timely manner, DHCD will allow the RAA to delay the reexam. Any delayed reexams must follow HCV-7 and be completed fully by December 31, 2021.
PH and HCV-3 Annual reexamination Income Verification	<p><u>Regulatory Authority</u> 24 CFR §§ 5.233(a)(2), 960.259(c), 982.516(a)</p> <p><u>Sub-regulatory Guidance</u> PIH Notice 2018-18</p>	<ul style="list-style-type: none"> Waives the requirements to use the income hierarchy, including the use of EIV, and will allow PHAs to consider self-certification as the highest form of income verification PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later 	<ul style="list-style-type: none"> 12/31/21 	Yes		DHCD previously sent out guidance that it will permit RAAs to temporarily waive rules requiring notarization and/or in-person verification of self-verification documentation (see Administrative Plan § 6.1), with the understanding that if there is a question of the veracity of the self-verification, follow-up inquiries may be conducted at a later time. DHCD requests that RAAs make all reasonable efforts to continue to use the income verification hierarchy. When it is not feasible, DHCD will allow RAAs to forgo third-party verification and may accept self-certification as the highest form of verification. DHCD notes that EIV is still running and accessible remotely and should continue to be used routinely to the extent possible for SocSec & SSI benefits & Medicare Part B premiums.

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<p>PH and HCV-4 Interim reevaluations</p>	<p><u>Statutory Authority</u> Section 3(a)(1)</p> <p><u>Regulatory Authority</u> 24 CFR §§ 5.233(a)(2), 982.516(c)(2), 960.257(b), (c), and (d), 982.259(c)</p> <p><u>Sub-regulatory Guidance</u> PIH Notice 2018-18</p>	<ul style="list-style-type: none"> • Waives the requirement to use the income verification requirements, including the use of EIV, for interim reevaluations • PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later 	<ul style="list-style-type: none"> • 12/31/21 	<p>Yes</p>		<p>DHCD previously sent out guidance that it will permit RAAs to temporarily waive rules requiring notarization and/or in-person verification of self-verification documentation (see Administrative Plan § 6.1), with the understanding that if there is a question of the veracity of the self-verification, follow-up inquiries may be conducted at a later time. DHCD requests that RAAs make all reasonable efforts to continue to use the income verification hierarchy. When it is not feasible, DHCD will allow RAAs to forgo third-party verification and may accept self-certification as the highest form of verification. DHCD notes that EIV is still running and accessible remotely and should continue to be used routinely to the extent possible for SocSec & SSI benefits & Medicare Part B premiums.</p>
<p>PH and HCV-5 EIV System Monitoring</p>	<p><u>Regulatory Authority</u> 24 CFR § 5.233</p> <p><u>Sub-regulatory Guidance</u> PIH Notice 2018-18</p>	<ul style="list-style-type: none"> • Waives the mandatory EIV monitoring requirements 	<ul style="list-style-type: none"> • 12/31/21 	<p>Yes</p>		<p>DHCD urges the RAAs to continue EIV monitoring, including IVT, as much as possible and notes the potential administrative burden if there is a backlog of EIV deficiencies that eventually need to be corrected.</p>
<p>PH and HCV-6 FSS Contract of Participation</p>	<p><u>Regulatory Authority</u> 24 CFR § 984.303(d)</p>	<ul style="list-style-type: none"> • Provides for extensions to FSS contract of participation 	<ul style="list-style-type: none"> • 12/31/21 	<p>Yes</p>		<p>DHCD will be adding COVID-19 as a dropdown reason for FSS extensions in the FSS Data Collection Tool.</p>
<p>PH and HCV-7 Waiting List</p>	<p><u>Regulatory Authority</u> 24 CFR § 982.206(a)(2)</p> <p><u>Sub-regulatory Guidance</u> PIH Notice 2012-34</p>	<ul style="list-style-type: none"> • Waives public notice requirements for opening and closing waiting list • Requires alternative process 	<ul style="list-style-type: none"> • 12/31/21 	<p>No</p>		<p>N/A. DHCD's HCVP waiting list is open.</p>
<p>PH and HCV-8 Eligibility Determination: Income Verification</p>	<p><u>Regulatory Authority</u> 24 CFR § 982.201(e)</p> <p><u>Sub-regulatory Guidance</u> Notice PIH 2018-18</p>	<ul style="list-style-type: none"> • Waives the requirements to use the income hierarchy and will allow PHAs to consider self-certification as the highest form of income 	<ul style="list-style-type: none"> • 12/31/21 	<p>Yes</p>	<p>5/21/21</p>	<p>DHCD previously sent out guidance that it will permit RAAs to temporarily waive rules requiring notarization and/or in-person verification of self-verification documentation (see Administrative Plan § 6.1), with the understanding that if there is a question of</p>

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		<p>verification in eligibility determinations</p> <ul style="list-style-type: none"> • PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later 				<p>the veracity of the self-verification, follow-up inquiries may be conducted at a later time. DHCD requests that RAAs make all reasonable efforts to continue to use the income verification hierarchy. When it is not feasible, DHCD will allow RAAs to forgo third-party verification and may accept self-certification as the highest form of verification. DHCD notes that EIV is still running and accessible remotely and should continue to be used routinely to the extent possible for SocSec & SSI benefits & Medicare Part B premiums.</p>
PH and HCV-9 Eligibility Determination: Social Security Number and Citizenship Verification	<p><u>Statutory Authority</u> 42 USC 1436a(d)(2)</p> <p><u>Regulatory Authority</u> 24 CFR §§ 5.216(b)(2), (g), (h), 5.218, 5.508(b)(2)(ii), (b)(3)(ii), (g)</p> <p><u>Sub-regulatory Guidance</u> Notice PIH 2012-10</p>	<ul style="list-style-type: none"> • HUD is waiving the requirement to obtain and verify SSN documentation and documentation evidencing eligible noncitizen status before admitting applicants to the HCV and Public Housing programs 	<ul style="list-style-type: none"> • 12/31/21 	Yes	5/21/21	<p>Individuals who are unable to provide required citizenship documentation prior to admission must provide that documentation within 90 days of admission to be eligible for continued assistance, pending verification. Additionally, RAAs may accept self-certification of date of birth and disability status if a higher level of verification is not immediately available. If self-certification is used, the RAA must obtain a higher level of verification within 90 days of admission or verify the information in EIV. The adoption of this waiver does not authorize any ineligible family to receive assistance under these programs. If an RAA determines that an ineligible family received assistance, the RAA must take steps to terminate that family from the program.</p>
HQS-1 Initial inspection	<p><u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(o)(8)(C)</p> <p><u>Regulatory Authority</u> 24 CFR §§ 982.305(a), 982.305(b), 982.405</p>	<ul style="list-style-type: none"> • Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies • Where self-certification was used, PHA must conduct an HQS inspection as soon as 	<ul style="list-style-type: none"> • 12/31/21 • No later than 6/30/22 	Yes	04/13/2020	<p>DHCD is encouraging the RAAs to conduct physical inspections on vacant units when possible and safe. If in-person inspections are not feasible or safe to complete, DHCD will allow RAAs to accept owner certifications on initial inspections. In these cases, DHCD/RAA retains the right to conduct an inspection at any time deemed necessary and in any case, the RAA must conduct an HQS</p>

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		reasonably possible but no later than June 30, 2022				inspection as soon as reasonably possible but no later than June 30, 2022. Outside of adopting the HUD waiver, DHCD is also waiving its requirement for documentation of a Board of Health inspection in the participant's file.
HQS-2 PBV Pre-HAP Contract Inspections, PHA acceptance of completed units	<u>Statutory Authority</u> Section 8(o)(8)(A) <u>Regulatory Authority</u> 24 CFR §§ 983.103(b), 983.156(a)(1)	<ul style="list-style-type: none"> Changes inspection requirements, allowing for owner certification that there are no life-threatening deficiencies Where self-certification was used, PHA must conduct an HQS inspection as soon as reasonably possible but no later than June 30, 2022 	<ul style="list-style-type: none"> 12/31/21 No later than 6/30/22 	Yes		DHCD is encouraging the RAAs to conduct physical inspections on vacant units when possible and safe. If in-person inspections are not feasible or safe to complete, DHCD will allow RAAs to accept owner certifications on initial inspections. In these cases, DHCD/RAA retains the right to conduct an inspection at any time deemed necessary and, in any case, the RAA must conduct an HQS inspection as soon as reasonably possible but no later than June 30, 2022.
HQS-3 Non-Life Threatening HQS - Initial Unit Approval	<u>Statutory Authority</u> Section 8(o)(8)(A)(ii) <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> Allows for extension of up to 30 days for owner repairs of non-life-threatening conditions 	12/31/21	No		Current DHCD policy remains in effect.
HQS-4 Initial HQS - Alternative Inspections	<u>Statutory Authority</u> Section 8(o)(8)(A)(iii) <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> Under Initial HQS Alternative Inspection Option - allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies Where self-certification was used, PHA must inspect the unit no later than one year from the date of the owner's certification 	12/31/21	No		N/A. DHCD does not accept Alternative Inspections.
HQS-5	<u>Statutory Authority</u> Section 8(o)(D)	<ul style="list-style-type: none"> Allows for delay in biennial inspections 	<ul style="list-style-type: none"> 12/31/21 	Yes		DHCD is not requiring RAAs to conduct inspections of occupied units if it is deemed

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Biennial Inspections	<u>Regulatory Authority</u> 24 CFR §§ 982.405(a), 983.103(d)	<ul style="list-style-type: none"> All delayed biennial inspections must be completed as soon as reasonably possible but by no later than December 31, 2022 	<ul style="list-style-type: none"> No later than 12/31/22 		unsafe during the COVID-19 emergency. If in-person inspections are not feasible or safe to complete, DHCD will allow RAAs to accept owner certifications on biennial inspections. In these cases, DHCD/RAA retains the right to conduct an inspection at any time deemed necessary, and in any case, the RAA will need to inspect the unit no later than December 31, 2022.
HQS-6 Interim Inspections	<u>Statutory Authority</u> Section 8(o)(8)(F) <u>Regulatory Authority</u> 24 CFR §§ 982.405(g), 983.103(e)	<ul style="list-style-type: none"> Waives the requirement for the PHA to conduct interim inspection and requires alternative method Allows for repairs to be verified by alternative methods 	<ul style="list-style-type: none"> 12/31/21 	Yes	If the RAA is notified of a life-threatening condition, it must notify the owner who must provide evidence (text/email of photos, invoices, tenant certification, etc.) that is satisfactory to the RAA that it is fixed or that it doesn't exist within 24 hours. If non-life-threatening, RAA must notify the owner within 30 days and the owner must provide verification (text/email of photos, invoices, tenant certification, etc.) that is satisfactory to the RAA within 30 days of notification. The RAA is not required to physically re-inspect the unit.
HQS-7 PBV Turnover Inspections	<u>Regulatory Authority</u> 24 CFR § 983.103(c)	<ul style="list-style-type: none"> Allows for PBV turnover units to be filled based on owner certification there are no life-threatening deficiencies Allows for delayed full HQS inspection 	<ul style="list-style-type: none"> 12/31/21 No later than 6/30/22 	Yes	DHCD is encouraging the RAAs to conduct physical inspections on vacant units when possible and safe. If in-person inspections are not feasible or safe to complete, DHCD will allow RAAs to accept owner certifications on PBV Turnover Inspections. In these cases, DHCD/RAA retains the right to conduct an inspection at any time deemed necessary, and in any case, the RAA must conduct an HQS inspection as soon as reasonably possible but no later than June 30, 2022.
HQS-8 PBV HAP Contract – HQS Inspections to Add or Substitute Units	<u>Statutory Authority</u> Section 8(o)(8)(A); Housing Opportunity Through Modernization Act of 2016: Implementation of Various Section 8 Voucher Provisions	<ul style="list-style-type: none"> Allows for PBV units to be added or substituted in the HAP contract based on owner certification there are no life-threatening deficiencies 	<ul style="list-style-type: none"> 12/31/21 	Yes	While DHCD is adopting this waiver, we will apply it on a case-by-case basis. If this situation arises, the RAA will need to request the waiver of DHCD prior to implementation.

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	<u>Regulatory Authority</u> 24 CFR § 983.207(a), 983.207(b)	<ul style="list-style-type: none"> Allows for delayed full HQS inspection 	<ul style="list-style-type: none"> No later than 6/30/22 			
HQS-9 HQS QC Inspections	<u>Regulatory Authority</u> 24 CFR §§ 982.405(b), 983.103(e)(3)	<ul style="list-style-type: none"> Provides for a suspension of the requirement for QC sampling inspections 	<ul style="list-style-type: none"> 12/31/21 	Yes		DHCD will require the RAAs to resume QC inspections after December 31, 2021.
HQS-10 HQS Space and Security	<u>Regulatory Authority</u> 24 CFR § 982.401(d)	<ul style="list-style-type: none"> Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons. 	Remains in effect for the duration the current lease term or one year from the date of this notice, whichever period is longer	Yes		This waiver does not apply to an initial or new lease. DHCD will allow this waiver, but notes that this does not apply to (and DHCD does not have the authority to waive) the state sanitary code.
HQS-11 Homeownership HQS	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(y)(3)(B) <u>Regulatory Authority</u> 24 CFR § 982.631(a)	<ul style="list-style-type: none"> Waives the requirement to perform an initial HQS inspection in order to begin making homeownership assistance payments Requires family to obtain independent professional inspection 	<ul style="list-style-type: none"> 12/31/21 	No		N/A. DHCD does not operate a Homeownership program.
HCV-1 Administrative Plan	<u>Regulatory Authority</u> 24 CFR § 982.54 (a)	<ul style="list-style-type: none"> Waives the requirement to adopt revisions to the admin plan 	<ul style="list-style-type: none"> 12/31/21 	No		N/A. DHCD does not have a Board of Directors. Undersecretary approval is still required.
HCV-2 PHA Oral Briefing	<u>Regulatory Authority</u> 24 CFR §§ 982.301(a)(1), 983.252(a)	<ul style="list-style-type: none"> Waives the requirement for an oral briefing Provides for alternative methods to conduct required voucher briefing 	<ul style="list-style-type: none"> 12/31/21 	Yes		DHCD will allow RAAs to conduct alternative briefings that effectively communicate with, and allow for equal participation of, each family member, including those with vision, hearing, and other communication-related disabilities, and ensures meaningful access for persons with limited English proficiency.
HCV-3 Term of Voucher - Extensions of Term	<u>Regulatory Authority</u> 24 CFR § 982.303(b)(1)	<ul style="list-style-type: none"> Allows PHAs to provide voucher extensions regardless of current PHA policy 	<ul style="list-style-type: none"> 12/31/21 (HUD) 	Yes		DHCD previously sent out guidance related to voucher term extensions. DHCD policy currently provides for a 60-day voucher search term, with an automatic 30-day extension upon request, and other

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						extensions upon request in extenuating circumstances. During the state of emergency, DHCD will waive the extension requirements set forth in DHCD's Administrative Plan § 5.5.2. The 60-day voucher search term shall be extended automatically until 30 calendar days past the expiration of the state of emergency. During that period, applicants will not be required to submit a request for extension.
HCV-4 PHA Approval of Assisted Tenancy	<u>Regulatory Authority</u> 24 CFR § 982.305(c)	<ul style="list-style-type: none"> Provides for HAP payments for contracts not executed within 60 days PHA must not pay HAP to owner until HAP contract is executed 	<ul style="list-style-type: none"> 12/31/21 	Yes		DHCD is allowing the RAA and owner to execute the HAP contract no later than 120 days from the beginning of the lease term.
HCV-5 Absence from Unit	<u>Regulatory Authority</u> 24 CFR § 982.312	<ul style="list-style-type: none"> Allows for PHA discretion on absences from units longer than 180 days PHAs must not make HAP payments beyond December 31, 2021 for units vacant more than 180 consecutive days 	<ul style="list-style-type: none"> 12/31/21 	Yes		Through December 31, 2021, DHCD will allow the RAAs to allow extended absences from units due to extenuating circumstances (e.g., hospitalization, extended stays at nursing homes, caring for family members).
HCV-6 Automatic Termination of the HAP Contract	<u>Regulatory Authority</u> 24 CFR § 982.455	<ul style="list-style-type: none"> Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically 	<ul style="list-style-type: none"> 12/31/21 	Yes		The RAA may extend the HAP contract until December 31, 2021 with written notice to the Owner and Tenant.
HCV-7 Increase in Payment Standard	<u>Regulatory Authority</u> 24 CFR § 982.505(c)(4)	<ul style="list-style-type: none"> Provides PHAs with the option to increase the payment standard for the family at any time after the effective date of the increase, rather than waiting for the next regular reexamination to do so 	<ul style="list-style-type: none"> 12/31/21 (HUD) 	Yes		DHCD received approval of a technical amendment to its MTW Plan allowing for the application of increased payment standards at contract rent increase. This policy change is permanent and not subject to the applicability period of HUD PIH Notice 2021-14.

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HCV-8 Utility Allowance Schedule	<u>Regulatory Authority</u> 24 CFR § 982.517	<ul style="list-style-type: none"> Provides for delay in updating utility allowance schedule 	<ul style="list-style-type: none"> 12/31/21 (HUD) 	Yes		RAAs will need to have reviewed and updated non-MTW utility allowances prior to December 1, 2021.
HCV-9 Homeownership Counseling	<u>Statutory Authority</u> Section 8(y)(1)(D) <u>Regulatory Authority</u> 24 CFR §§ 982.630, 982.636(d)	<ul style="list-style-type: none"> Waives the requirement for the family to obtain pre-assistance counseling 	<ul style="list-style-type: none"> 12/31/21 	No		N/A. DHCD does not have a Homeownership program.
HCV-10 Family Unification Program: FUP Youth Age Eligibility to Enter HAP Contract	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> Allows PHAs to increase age to 26 for foster youth initial lease-up 	<ul style="list-style-type: none"> 12/31/21 	Yes		DHCD will accept referrals from DCF within current allocation limits and allow RAAs to execute HAP contracts with DCF-referred youth up until their 26 th birthday (instead of 25).
HCV-11 Family Unification Program: Length of Assistance for Youth	<u>Statutory Authority</u> 42 U.S.C. 1437f(x)(2)	<ul style="list-style-type: none"> Allows PHAs to suspend terminations of assistance for FUP youth who will reach the 36-month limit between April 10, 2020, and June 30, 2021 for up to six months from the date the youth's assistance would have been terminated absent this waiver 	<ul style="list-style-type: none"> 12/31/21 	Yes	7/15/20	DHCD will allow RAAs to suspend the termination of FUP AOP youth who will reach the 36-month program limit between April 10 and June 30, 2021. The period of availability to grant the extension ends on December 31, 2021.
HCV-12 Family Unification Program: Timeframe for Referral	<u>Statutory Authority</u> 42 U.S.C. 1437f(x)(2)	<ul style="list-style-type: none"> Allows PHAs to accept referrals from child welfare agencies for youth who will leave foster care within 120 days, rather than the statutory 90 days 	<ul style="list-style-type: none"> 12/31/21 	Yes	7/15/20	DHCD will allow RAAs to accept FUP referrals from DCF for youth who will leave foster care within 120 days rather than the usual 90 days.
HCV-13 Homeownership: Maximum Term of Assistance	<u>Regulatory Authority</u> 24 CFR § 982.634(a)	<ul style="list-style-type: none"> HUD is waiving the maximum term on homeownership assistance for non-elderly/non-disabled families so that for any family in the last year of the term that is experiencing 	<ul style="list-style-type: none"> 12/31/21 	No		N/A. DHCD does not have a Homeownership program.

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		financial hardship due to COVID-19, a PHA may provide homeownership assistance for up to one additional year				
HCV-14 <u>Mandatory Removal of Unit from PBV HAP Contract</u>	<u>Regulatory Authority</u> 24 CFR §§ 983.211(a); 983.258	<ul style="list-style-type: none"> • HUD is waiving the requirement to remove a unit from a PBV HAP contract after 180 days of zero housing assistance payments to the unit owner on behalf of the family residing in the unit, and is authorizing a PHA, at its discretion, to keep such units under contract for a period of time that exceeds 180 days but does not extend beyond June 30, 2021 • In addition, HUD is providing that a PHA may resume housing assistance payments on behalf of such a family should the family's income change at any point during the period of time covered by the extension 	<ul style="list-style-type: none"> • 12/31/21 	Yes	7/15/20	If a PBV unit is zero-HAP for more than 180 days, DHCD may decline to remove that unit from the PBV contract until after June 30, 2021, and if the subject family's income were to change during the time of extension, the RAA may resume HAP payments on behalf of that family.
PH-1 Fiscal closeout of Capital Grant Funds	<u>Regulatory Authority</u> 24 CFR § 905.322(b)	<ul style="list-style-type: none"> • Extension of deadlines for ADCC and AMCC 	Varies by PHA	N/A		N/A
PH-2 Total Development Costs	<u>Regulatory Authority</u> 24 CFR § 905.314(c)	<ul style="list-style-type: none"> • Waives the TDC and HCC limits permitting approval of amounts in excess of published TDC by 25% to 50% on a case by case basis 	Applies to development proposals submitted to HUD no later than December 31, 2021	N/A		N/A
PH-3 Cost limitations	<u>Regulatory Authority</u> 24 CFR § 905.314(j)	<ul style="list-style-type: none"> • Allows for the use of force account labor for 	<ul style="list-style-type: none"> • 12/31/21 	N/A		N/A

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		modernization activities in certain circumstances				
PH-4 ACOP	<u>Regulatory Authority</u> 24 CFR § 960.202(c)(1)	<ul style="list-style-type: none"> Changes to approval process for ACOP 	<ul style="list-style-type: none"> 12/31/21 	N/A		N/A
PH-5 CSSR	<u>Statutory Authority</u> Section 12(c) <u>Regulatory Authority</u> 24 CFR §§ 960.603(a), 960.603(b)	<ul style="list-style-type: none"> Temporarily suspends CSSR 	<ul style="list-style-type: none"> 12/31/21 	N/A		N/A
PH-6 Energy Audits	<u>Regulatory Authority</u> 24 CFR § 965.302	<ul style="list-style-type: none"> Allows for delay in due dates of energy audits 	<ul style="list-style-type: none"> 12/31/21 	N/A		N/A
PH-7 Over-income Families	<u>Housing Opportunity Through Modernization Act of 2016: Final Implementation of the Public Housing Income Limit</u> 83 FR 35490 <u>Sub-regulatory Guidance</u> Notice PIH 2019-11	<ul style="list-style-type: none"> Changes to timeframes for determination of over-income 	<ul style="list-style-type: none"> 12/31/21 	N/A		N/A
PH-8 Resident Council Elections	<u>Regulatory Authority</u> 24 CFR § 964.130(a)(1)	<ul style="list-style-type: none"> Provides for delay in resident council elections 	<ul style="list-style-type: none"> 12/31/21 	N/A		N/A
PH-9 Utility Allowance	<u>Regulatory Authority</u> 24 CFR § 965.507	<ul style="list-style-type: none"> Provides for delay in updating utility allowance schedule 	<ul style="list-style-type: none"> 12/31/21 	N/A		N/A
PH-10 Tenant Notifications	<u>Regulatory Authority</u> 24 CFR § 966.5	<ul style="list-style-type: none"> Advance notice not required except for policies related to tenant charges 	<ul style="list-style-type: none"> 12/31/21 	N/A		N/A
PH-11 Designated Housing Plan Renewals	<u>Statutory Authority</u> Section 7(f)	<ul style="list-style-type: none"> Extends the Plan's effective period through June 30, 2021 for Plans due to expire between July 2, 2020 and June 30, 2021 	<ul style="list-style-type: none"> 12/31/21 	N/A		N/A
PH-12 Public Housing	<u>Statutory Authority</u> Section 6(f)(3)	<ul style="list-style-type: none"> Waives the requirement that the PHA must inspect each project 	<ul style="list-style-type: none"> 12/31/20 	N/A		N/A

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Agency Annual Self-Inspections	<u>Regulatory Authority</u> 24 CFR § 902.20(d)					
PH-13 Over-Income Limit: Termination Requirement	<u>Statutory Authority</u> Section 16(a) as amended by section 103 of HOTMA <u>Implementation Notice:</u> Housing Opportunity Through Modernization Act of 2016: Final Implementation of Public Housing Income Limit, 83 Fed. Reg. 35,490 (July 26, 2018)	<ul style="list-style-type: none"> • Waives the requirement that a family whose income has exceeded the over-income limit for the locality for two consecutive years be terminated within 6 months of the third income determination • As an alternative requirement, over-income families will remain public housing households instead of being terminated and will be charged the applicable FMR as the family's monthly rental amount 	<ul style="list-style-type: none"> • 12/31/21 	N/A		N/A
PH-14 Annual Choice of Rent	<u>Statutory Authority</u> 42 USC 1437a(a)(2)(A) <u>Regulatory Authority</u> 24 CFR § 960.253	<ul style="list-style-type: none"> • Allows families an additional opportunity to select an income-based or flat rent 	<ul style="list-style-type: none"> • 12/31/21 	N/A		N/A
MS-1 Initial Lease Term	<u>Statutory Authority</u> 42 USC 1437f(o)(7)(A) <u>Regulatory Authority</u> 24 CFR § 982.309(a)(2)(ii)	<ul style="list-style-type: none"> • Allows PHAs to approve an initial lease term of less than one year, regardless of prevailing market practices 	<ul style="list-style-type: none"> • 12/31/21 	Yes	12/9/20	To provide a greater range of housing opportunities for Mainstream voucher holders, the PHA may enter initial lease terms of less than one year regardless of whether the shorter lease term is a prevailing market practice.
MS-2 Criminal Background Screening	<u>Regulatory Authority</u> 24 CFR §§ 5.856, 982.553(a)	<ul style="list-style-type: none"> • Allows PHAs to establish, as an alternative requirement, screening requirements for applicants for Mainstream vouchers which are distinct from those in place for its HCV program in general 	<ul style="list-style-type: none"> • 12/31/21 (HUD) 	Yes	12/9/20	DHCD reminds RAAs to exercise discretion in criminal background screening of Mainstream applicants, as provided in the Admin Plan, in order to facilitate reentry and successful transition to long-term housing.

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MS-3 Mainstream Age Eligibility to Enter HAP Contract	<u>Statutory Authority</u> 42 USC 8013(k)(2)	<ul style="list-style-type: none"> Allows PHAs to establish an alternative requirement to permit Mainstream-eligible families to be placed under HAP contract until the 63rd birthday of the Mainstream-eligible family member 	<ul style="list-style-type: none"> 12/31/21 	Yes	12/9/20	DHCD has chosen to adopt the expansion of the definition of an eligible non-elderly family member to include those who were issued a voucher prior to turning 62 and were not yet 63 on the effective date of the HAP contract.
MR-1 Family Income and Composition: Delayed Annual Examinations	<u>Statutory Authority</u> Section 3(a)(1) of the USHA of 1937 <u>Regulatory Authority</u> 24 CFR § 882.515(a)	<ul style="list-style-type: none"> Permits the PHA to delay the annual reexamination of income and family composition 	<ul style="list-style-type: none"> 12/31/21 	Yes	5/21/21	DHCD requests that RAAs make all reasonable efforts to fully complete reexaminations in a timely manner. If it is not feasible or safe to complete an annual reexam in a timely manner, DHCD will allow the RAA to delay the reexam. Any delayed reexams must be completed fully by December 31, 2021.
MR-0 Family Income and Composition: Annual Examination; Income Verification Requirements	<u>Regulatory Authority</u> 24 CFR § 5.233(a)(2) <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> Waives the requirements to use the income hierarchy, including the use of EIV, and will allow PHAs to consider self-certification as the highest form of income verification PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later 	<ul style="list-style-type: none"> 12/31/21 	Yes	5/21/21	DHCD previously sent out guidance that it will permit RAAs to temporarily waive rules requiring notarization and/or in-person verification of self-verification documentation (see Administrative Plan § 6.1), with the understanding that if there is a question of the veracity of the self-verification, follow-up inquiries may be conducted at a later time. DHCD requests that RAAs make all reasonable efforts to continue to use the income verification hierarchy. When it is not feasible, DHCD will allow RAAs to forgo third-party verification and may accept self-certification as the highest form of verification. DHCD notes that EIV is still running and accessible remotely and should continue to be used routinely to the extent possible for SocSec & SSI benefits & Medicare Part B premiums.
MR-3 Family Income and Composition:	<u>Statutory Authority</u> Section 3(a)(1) of the USHA of 1937	<ul style="list-style-type: none"> Waives the requirement to use the income verification requirements, including the 	<ul style="list-style-type: none"> 12/31/21 	Yes	5/21/21	DHCD previously sent out guidance that it will permit RAAs to temporarily waive rules requiring notarization and/or in-person verification of self-verification documentation

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Interim Examinations	<p><u>Regulatory Authority</u> 24 CFR §§ 5.233(a)(2), 882.515(b)</p> <p><u>Sub-regulatory Guidance</u> Notice PIH 2018-18</p>	<p>use of EIV, for interim reexaminations</p> <ul style="list-style-type: none"> PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later 				(see Administrative Plan § 6.1), with the understanding that if there is a question of the veracity of the self-verification, follow-up inquiries may be conducted at a later time. DHCD requests that RAAs make all reasonable efforts to continue to use the income verification hierarchy. When it is not feasible, DHCD will allow RAAs to forgo third-party verification and may accept self-certification as the highest form of verification. DHCD notes that EIV is still running and accessible remotely and should continue to be used routinely to the extent possible for SocSec & SSI benefits & Medicare Part B premiums.
MR-4 Enterprise Income Verification Monitoring	<p><u>Regulatory Authority</u> 24 CFR § 5.233</p> <p><u>Sub-regulatory Guidance</u> Notice PIH 2018-18</p>	<ul style="list-style-type: none"> Waives the mandatory EIV monitoring requirements 	<ul style="list-style-type: none"> 12/31/21 	Yes	5/21/21	DHCD urges the RAAs to continue EIV monitoring, including IVT, as much as possible and notes the potential administrative burden if there is a backlog of EIV deficiencies that eventually need to be corrected.
MR-5 PHA Inspection Requirement: Annual Inspections	<p><u>Regulatory Authority</u> 24 CFR § 882.516(b)</p>	<ul style="list-style-type: none"> Waives the annual inspection requirement and allows PHAs to delay annual inspections for Mod Rehab units 	<ul style="list-style-type: none"> 12/31/21 	Yes	5/21/21	All delayed annual inspections must be completed as soon as reasonably possible but no later than one year after the date the annual inspection would have been required absent the waiver. Use of this waiver by the PHA does not relieve owners of their responsibility to maintain the unit in accordance with HQS as required in the HAP contract, nor does it in any way restrict the PHA from taking action to enforce the owner's obligations.
MR-6 Adjustment of Utility Allowance	<p><u>Regulatory Authority</u> 24 CFR § 882.510</p>	<ul style="list-style-type: none"> Provides for delay in updating utility allowance schedule 	<ul style="list-style-type: none"> 12/31/21 (HUD) 	Yes	5/21/21	RAAs will need to have reviewed and updated non-MTW utility allowances prior to December 1, 2021.
11a PHAS	<p><u>Regulatory Authority</u> 24 CFR Part 902</p>	<ul style="list-style-type: none"> Allows for alternatives related to inspections 	HUD will resume issuing new PHAS scores starting with PHAs with FYE dates of 12/31/21	N/A		N/A

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		<ul style="list-style-type: none"> PHA to retain prior year PHAS score unless requests otherwise 				
11b SEMAP	<u>Regulatory Authority</u> 24 CFR Part 985	<ul style="list-style-type: none"> PHA to retain prior year SEMAP score unless requests otherwise 	HUD will resume issuing new SEMAP scores starting with PHAs with FYE dates of 12/31/21	N/A		N/A
11b-1 SEMAP	<u>Regulatory Authority</u> 24 CFR § 985.105(d)	<ul style="list-style-type: none"> Allows field offices to perform a remote SEMAP confirmatory review instead of an onsite confirmatory review before changing a PHA's rating from troubled to standard or high performer 	<ul style="list-style-type: none"> 12/31/21 	N/A		N/A
11b-2 SEMAP	<u>Regulatory Authority</u> 24 CFR § 985.101(a)	<ul style="list-style-type: none"> Waives the requirement for PHAs to submit an annual SEMAP certification in PIC within 60 days of FYE during the period of time that HUD will roll forward prior year SEMAP scores 	<ul style="list-style-type: none"> 12/31/21 	N/A		N/A
11c Financial Reporting	<u>Regulatory Authority</u> 24 CFR §§ 5.801(c), 5.801(d)(1)	<ul style="list-style-type: none"> Allows for extensions of financial reporting deadlines 	Varies by PHA FYE	Yes		DHCD will submit its audited financial statements by September 30, 2021.
12a Form HUD 50058	<u>Regulatory Authority</u> 24 CFR Part 908, § 982.158 <u>Sub-regulatory Guidance</u> PIH Notice 2011-65	<ul style="list-style-type: none"> Waives the requirement to submit 50058 within 60 days Alternative requirement to submit within 90 days of the effective date of action 	<ul style="list-style-type: none"> 12/31/20 	Yes		As this extension is now expired, DHCD is requesting all RAAs to make efforts to continue to submit HUD 50058 forms within the 60 days, whenever possible.
12b Designated housing plan	<u>Statutory Authority</u> Section 7(e)(1)	<ul style="list-style-type: none"> Allows for HUD to delay notification about designated housing plan 	<ul style="list-style-type: none"> 7/31/20 	N/A		N/A
12c Deadline for reporting Operating and	<u>Statutory Authority</u> Section 9(j) <u>Regulatory Authority</u> 24 CFR § 905.306(d)(5)	<ul style="list-style-type: none"> Provides a one-year extension 	For all open Capital Fund grants, an 18-month extension from the obligation and expenditure end dates in	N/A		N/A

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Capital Fund expenditures			LOCCS as of April 10, 2020			
12d Section 6(j) 1- and 2-Year Substantial Improvement Requirements	<p><u>Statutory Authority</u> Section 6(j)(3)(B)(ii)</p> <p><u>Regulatory Authority</u> 24 CFR § 902.75(d)</p>	<ul style="list-style-type: none"> For PHAs designated as troubled prior to the date of this Notice that have not received a PHAS assessment for the first full fiscal year after the initial notice of the troubled designation, HUD will: (1) evaluate the 1-year substantial improvement benchmark based on the first released score for fiscal years ending on or after June 30, 2022; and, (2) toll the evaluation of the 2-year recovery benchmark to the next sequential fiscal year 	The period of availability for this waiver and alternative requirement: (1) is effective on the date of this Notice; and, (2) will continue through June 30, 2023, at which time HUD will reevaluate any additional impacts of this waiver on any PHA in the process of being evaluated	N/A		N/A